



John R. Feore
+1 202 776 2786
jfeore@cooley.com

May 6, 2016

VIA COURIER

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Attention: Video Division, Media Bureau

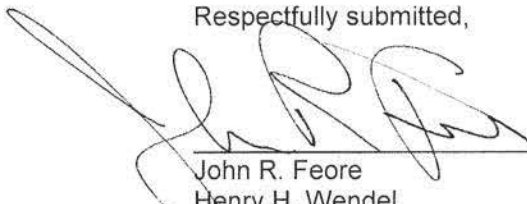
Re: MB Docket No. 16-93, RM-11764
Comments in Support of NPRM to Amend the DTV Table of Allotments

Dear Ms. Dortch:

On behalf of America 51, L.P., licensee of commercial television station KPPX-TV, Tolleson, Arizona, we hereby transmit an original and one copy of the *Comments* in support of the Notice of Proposed Rulemaking to substitute channel 31 for channel 51 at Tolleson, Arizona in the DTV Table of Allotments.

If any additional information is needed in connection with this matter, please contact us.

Respectfully submitted,



John R. Feore
Henry H. Wendel
Counsel to America 51, L.P.

Enclosure

cc: Ms. Joyce Bernstein (*via e-mail*)
Mr. Peter Saharko (*via e-mail*)
Ms. Adrienne Denysyk (*via e-mail*)

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

| | | |
|---|---|---------------------|
| In the Matter of |) | |
| |) | |
| Amendment of Section 73.622(i) |) | MB Docket No. 16-93 |
| Post-Transition Table of DTV Allotments |) | RM-11764 |
| Television Broadcast Stations |) | |
| (Tolleson, Arizona) |) | |
| |) | |

To: Office of the Secretary
Attn: Chief, Video Division, Media Bureau

COMMENTS

America 51, L.P. ("America 51") licensee of KPPX-TV, Tolleson, Arizona, Facility Identification Number 26655 (the "Station"), by its attorneys and pursuant to Sections 1.415 and 1.419 of the Commission's Rules,¹ hereby submits these comments in response to the Commission's *Notice of Public Rulemaking* ("NPRM") in the above-captioned proceeding.² The NPRM proposes to substitute Channel 31 for Channel 51 at Tolleson, Arizona in the DTV Table of Allotments. America 51 strongly supports the proposed channel substitution.

America 51 hereby confirms its continuing interest in the proposal as set forth in the NPRM, which is incorporated herein by reference. As America 51 explained in its *Petition for Rule Making* dated January 27, 2016 and supplemented March 29, 2016 and April 12, 2016 (collectively, the "*Petition*"), the channel change would allow the Station to essentially replicate the coverage of its current licensed facility and would not affect the Commission's repacking flexibility. Moreover, the cessation of operations on

¹ 47 C.F.R. §§ 1.415, 1.419.

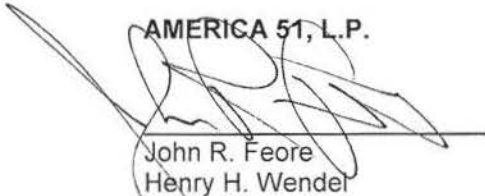
² See *Notice of Public Rulemaking*, DA 16-404, MB Docket No. 16-93, RM-11764 (rel. April 14, 2016).

Channel 51 would eliminate potential interference with wireless operations in the adjacent Lower 700 MHz A Block. If the Commission adopts the proposed channel change, America 51 intends to apply for authorization to operate the Station on Channel 31 and implement the change in accordance with the Commission's rules. America 51 respectfully requests that if the Commission adopts the proposed channel change, the change be made effective upon the release of the Report and Order in this proceeding.

As described in *Petition* and in the foregoing, America 51 respectfully requests that the Commission promptly adopt the changes proposed in the *NPRM*.

Respectfully submitted,

AMERICA 51, L.P.



John R. Feore
Henry H. Wendel

Cooley LLP
1299 Pennsylvania Ave., N.W.
Suite 700
Washington, D.C. 20004
(202) 842-7800

Its Attorneys.